

FILED

2018 OCT -9 AM 11:54

2 CLERK'S OFFICE
J3 BY SP

1 SCHMIDT, SETHI & AKMAJIAN
2 1790 East River Road, Suite 300
3 Tucson, Arizona 85718
4 FAX: (520) 790-1163

5 Dev K. Sethi
6 PCC #65271, SB# 018913
7 Direct Line: 520.545.1663
8 E-Mail: dsethi@azinjurylaw.com

9
10 **SUPERIOR COURT FOR THE STATE OF ARIZONA**

11 **IN AND FOR THE COUNTY OF COCHISE**

12 THOMAS ABRUZZO, natural father on
13 behalf of ASHLEY ABRUZZO AND
14 KRISTA ABRUZZO, minors,

15 Plaintiffs,

16 vs.

17 SIERRA VISTA UNIFIED SCHOOL
18 DISTRICT, a political subdivision of the
19 state of Arizona; DAVID F. FALCON and
20 JANE DOE FALCON, husband and wife;

21 Defendants.

22 No. CV201800043

23 **STATEMENT OF FACTS IN
24 SUPPORT OF PLAINTIFF'S
MOTION FOR PARTIAL
SUMMARY JUDGMENT**

25 Assigned to: Charles A. Irwin, Div. 1

26 Pursuant to Rule 56, Arizona Rules of Civil Procedure, Plaintiff submits the
following Statement of Facts in Support of Plaintiff's Motion for Partial Judgment.

27 **STATEMENTS OF FACT**

28 1. Sierra Vista School District provides transportation for approximately 2,300
29 students in Cochise County. **Exhibit 1**, Deposition of Tia Faulconer, 8:4-17.

30 2. It operates one high school, one middle school, and five elementary schools.

31 *Id.*

32 3. The Abruzzo girls attended Huachuca Mountain Elementary School, and